

Honorable Chief Judge Ricardo S. Martinez

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

Daniel Ramirez Medina,

Plaintiff,

v.

U.S. DEPARTMENT OF HOMELAND
SECURITY; U.S. IMMIGRATION AND
CUSTOMS ENFORCEMENT; U.S.
CITIZENSHIP AND IMMIGRATION
SERVICES; MATTHEW E. HICKS,
[UNKNOWN FIRST NAME] PETER,
[UNKNOWN FIRST NAME] HERNANDEZ,
and KATHLYN LAWRENCE, U.S.
Immigration and Customs Enforcement
Officers (in their individual capacities); and
JOHN DOES 1-10 (in their individual
capacities),

Defendants.

Case No. 2:15-cv-00813-JLR

**STIPULATION AND [PROPOSED]
ORDER EXTENDING DEADLINE FOR
FEDERAL AGENCY DEFENDANTS TO
ANSWER PLAINTIFF'S SECOND
AMENDED COMPLAINT**

Noted for Consideration on
November 22, 2017

Pursuant to the Federal Rules of Civil Procedure, Defendants must answer Plaintiff's Second Amended Complaint ("SAC") on or before November 22, 2017. Due the length and complexity of the allegations of the SAC, Defendants will require additional time to answer.

Accordingly, the parties to the above-referenced action, by and through their undersigned counsel of record, hereby respectfully STIPULATE, AGREE, and JOINTLY REQUEST the Court extend Defendants' deadline to answer Plaintiff's Second Amended Complaint fourteen days, to December 6, 2017.

1 DATED: November 22, 2017

Respectfully submitted,

2 CHAD A. READLER
Principal Deputy Assistant
3 Attorney General

4 WILLIAM C. PEACHEY
5 Director

6 /s/ Jeffrey S. Robins

7 JEFFREY S. ROBINS

Assistant Director

8 U.S. Department of Justice

Civil Division

9 Office of Immigration Litigation

10 District Court Section

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/s/ Theodore J. Boutrous, Jr.

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/s/ Mark D. Rosenbaum

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JOSE GARCIA (SBN 46518), pro hac vice

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on November 22, 2017, I electronically filed the foregoing with the Clerk of Court using CM/ECF. I also certify that the foregoing document should automatically be served on all counsel of record via transmission of Notices of Electronic Filing generated by CM/ECF

/s/ Jeffrey S. Robins
JEFFREY S. ROBINS
Assistant Director
U.S. Department of Justice
Civil Division
Office of Immigration Litigation
District Court Section

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**[PROPOSED] ORDER EXTENDING
DEADLINE FOR FEDERAL AGENCY
DEFENDANTS TO ANSWER
PLAINTIFF'S SECOND AMENDED
COMPLAINT**

Noted for Consideration on
November 22, 2017

[Proposed] ORDER

The parties having so stipulated and agreed, it is hereby SO ORDERED.

Defendants' deadline to answer Plaintiff's Second Amended Complaint is extended
fourteen days, to December 6, 2017.

Dated this _____ day of November, 2017.

The Honorable Ricardo S. Martinez
United States District Judge